

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND

In re:

Shannon R. Majewski  
  
Debtor

Chapter 13  
Case Number 19-10718  
Honorable Diane Finkle

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**OBJECTIONS TO CONFIRMATION**

NOW COMES Creditor, OneMain Financial Services, Inc., by and through its attorneys, Orlans PC, and hereby Objects to Confirmation as follows:

1. Shannon R. Majewski executed a Mortgage to American General Financial Services, Inc. dated September 24, 2004 and recorded with the Newport Land Evidence Records at Book 1544, Page 1 (the "Mortgage").
2. The Mortgage is a first mortgage on real property owned by the Debtor known and numbered as 75 Pope Street, Newport, RI 02840.
3. OneMain Financial Services, Inc. is the current holder of the Mortgage.
4. The Debtor's Chapter 13 Plan proposes to pay post-petition monthly mortgage payments directly to Creditor, and acknowledges a pre-petition arrearage of \$159,984.11. However, the Plan does not provide for payment of any arrears, and instead states "Debtor proposes to pay mortgage arrearage through Loss Mitigation program." *See Plan Part 8*
5. The Mortgage is in default with an approximate pre-petition arrearage of \$193,505.17 and has an approximate unpaid total debt of \$429,257.72. By the filing of this Objection to the Debtor's Chapter 13 Plan, Creditor hereby sets forth its demand for payment and intent to hold the Debtor liable for the debt. The Proof of Claim bar date is July 10, 2019.
6. To date, the Debtor has not provided a loss mitigation application directly to Creditor, nor has she filed a Loss Mitigation Request with this Honorable Court.

7. Furthermore, the Debtor was reviewed for loss mitigation a total of eight (8) times between 2014 and 2017. The Debtor was offered trial modifications in December 2014 and March 2017, but failed to make any Trial Plan Payments.

WHEREFORE, OneMain Financial Services, Inc. by and through its attorneys prays that this Objection be sustained and Confirmation be denied.

Date: June 18, 2019

Respectfully Submitted,

/s/ Tatyana P. Tabachnik  
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